

October 21, 2009

The Honorable John D. Rockefeller IV  
Chairman  
Committee on Commerce, Science and Transportation  
United States Senate  
Washington, DC 20510

Dear Mr. Chairman:

I am writing in response to your October 9, 2009 letter to Federal Communications Commission Chairman Julius Genachowski. I want to personally reassure you that Frontier Communications recognizes the significant commitment needed to deliver high-quality communications services to consumers in West Virginia and the 13 other states where we are seeking to acquire assets from Verizon Communications.

We believe we can significantly improve the communications services that West Virginians receive today, especially with respect to broadband availability. Today Frontier serves 38 counties and offers broadband to approximately 92 percent of households, with 43 percent of residential consumers actually subscribing to our broadband services. We have given away approximately 11,000 personal computers to West Virginia customers who signed up for broadband packages, eliminating a very real hurdle to broadband adoption – the lack of a home PC. We want the opportunity to show what we can do for the rest of the state.

We are also concerned that roughly one-fifth of all West Virginia households presently lack access to terrestrial broadband. The vast majority of these households are in areas we seek to serve. If given the opportunity, we will do our part to extend broadband to those unserved areas. It is a key business opportunity for Frontier and a significant market-driven public interest benefit of this transaction.

Frontier is now the nation's third largest rural incumbent local exchange carrier (ILEC) and the sixth largest ILEC. This transaction will strengthen Frontier financially, increase its ability to invest in broadband and extend its innovative products and services to all of West Virginia. It is in the public interest for the FCC and the states involved in the transaction to approve these applications swiftly. Consumers and communities suffer from a delay in the approval process.

Frontier has the operational capabilities to handle West Virginia's communications needs from Day One. We have a solid plan in place to transfer Verizon's West Virginia customers to Frontier's existing systems. We have handled systems conversions of a comparable magnitude, most recently in 2007 and 2008, without problems or customer disruption. We do not need and are not building new back-office systems.

Employment is an issue of interest and concern to all, and Frontier will strengthen its West Virginia presence if the license transfers are approved. We will create a new regional headquarters in Charleston, West Virginia for Frontier's southeastern operations and add 40 new jobs there. As I have mentioned in prior discussions, Frontier employs a 'local market' business model which places paramount importance on the community. Local managers in each market report to a state general manager. The primary role of a local manager is to be a conduit for customer and community communications needs. Our managers are subject matter experts, but they are also the neighbors and friends of those they serve and are deeply involved in their communities.

The majority of day-to-day operations in West Virginia will continue to be performed by those who perform them today. The existing customer service, network and operations functions in West Virginia will continue after the transaction is complete. We have agreed to maintain employment for 18 months after closing for all employees who are Installers or Technicians. We also agreed to honor all of the collective bargaining agreements and continue existing employee benefits plans. We will receive a fully-funded pension plan. Verizon will retain all liabilities to provide retiree benefits to their pre-closing retirees. Verizon will provide funding for accrued benefits in accordance with their agreement for those Verizon employees who continue with Frontier after the closing. We know that achieving service and business goals depends upon an experienced staff that puts the customer first.

Frontier Communications is ready, willing and able to serve all of West Virginia. We want to increase our presence, provide high-quality services and a great customer experience to all West Virginians.

We believe our filings with the FCC demonstrate why this transaction is in the public interest. We look forward to discussing the matters you raised in your October 9<sup>th</sup> letter with you and your staff, and with the FCC and its staff, in the coming weeks.

With regards,

A handwritten signature in cursive script that reads "Maggie Wilderotter".

Maggie Wilderotter  
Chairman & CEO

cc:  
The Honorable Julius Genachowski  
Chairman  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554